

	)	
INTERNATIONAL CARDS COMPANY,	)	
LTD.,	)	
	)	
Plaintiff,	)	C.A. No. 13-CV-2576 (LJS)
	)	
v.	)	<b>DECLARATION OF DENISE L.</b>
	)	<b>PLUNKETT, ESQ. IN SUPPORT OF</b>
MASTERCARD INTERNATIONAL INC.,	)	<b>DEFENDANT’S MOTION FOR</b>
	)	<b>SUMMARY JUDGMENT AS TO</b>
Defendant.	)	<b>DAMAGES</b>
	)	

1. I am an attorney at the law firm Ballard Spahr LLP, counsel for MasterCard International Incorporated (“MasterCard”), defendant in the above-captioned matter. I submit this Declaration in Support of MasterCard’s Motion for Summary Judgment as to Damages.

3. Attached hereto as Exhibit B is a true and correct copy of excerpts from the May 1, 2015 Deposition of Anthony B. Creamer III, MasterCard's damages expert.

<sup>1</sup> In accordance with Rule III.B.3 of Your Honor's Individual Rules and Procedures for Civil Cases, full copies of the deposition excerpts attached hereto will be delivered to the Court on a CD. In accordance with Rule III.B.5 of Your Honor's Individual Rules and Procedures for Civil Cases, printed courtesy copies of all parties motion papers, including exhibits, will be submitted to Chambers at the time the reply is served.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts from Deposition Exhibit 240, MasterCard's Quarterly Monitoring Report ("QMR") for ICC, bates numbered M0127167.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts from the November 10, 2014 Fed. R. Civ. P. 30(b)(6) Deposition of Khalil Alami, the corporate representative of ICC.

7. Attached hereto as Exhibit F is a true and correct copy of excerpts from the Expert Rebuttal Report of Anthony B. Creamer III, dated March 27, 2015, MasterCard's damages expert.

8. Attached hereto as Exhibit G is a compilation of true and correct copies of: (i) information available on the Amman Stock Exchange website showing the daily historical closing price for ICC stock (available at [http://www.ase.com.jo/en/company\\_historical/CARD?xls=1](http://www.ase.com.jo/en/company_historical/CARD?xls=1)); (ii) information available on the Yahoo! Finance website showing the historical currency conversion rate for Jordanian Dinars to United States Dollars as of February 18, 2015 (available at <http://finance.yahoo.com>); (iii) excerpts from ICC's Consolidated Financial Statements as of December 31, 2012 showing the total number of ICC shares outstanding as December 31, 2012 (ICC 052633); and (iv) information available on the Jordanian Securities Depository Center website showing the total number of ICC shares outstanding as of June 28, 2016 (available at [http://sdc.com.jo/english/index.php?option=com\\_public&Itemid=28&security\\_report=131263](http://sdc.com.jo/english/index.php?option=com_public&Itemid=28&security_report=131263)).

Dated: June 30, 2016

BALLARD SPAHR LLP

/s/ Denise L. Plunkett

Denise L. Plunkett, Esq.

PlunkettD@ballardspahr.com

919 Third Avenue

New York, NY 1002

Telephone: (212) 223-0200

Fax: (212) 223-1942

*Attorney for Defendant*

*MasterCard International Incorporated*